

IN THE NORTHERN DISTRICT OF OKLAHOMA  
UNITED STATES OF AMERICA

PHILIP SANDERS, an )  
Individual and Husband and )  
Next of Kin of BRENDA JEAN )  
SANDERS, Deceased, )  
Plaintiff, )  
-vs- ) No. 17-cv-492-JHP-FHM  
TURN KEY HEALTH CLINICS, )  
a Limited liability company, )  
Defendants. )

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***DEPOSITION OF KERRI FERRIS***

TAKEN ON BEHALF OF THE PLAINTIFF

TAKEN AT 7447 SOUTH LEWIS AVENUE

TULSA, OKLAHOMA

SEPTEMBER 29, 2020

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REPORTED BY: RACHAEL A. ROPER, RPR

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- 1 A. It's a condition of the liver and it can cause a  
2 yellowing of the skin.
- 3 Q. It's a condition of the liver and -- I'm sorry?
- 4 A. It can cause a yellowing of the skin.
- 5 Q. Besides yellowing of the skin, have you been told  
6 any other things to look for?
- 7 A. I don't have any direct contact or haven't had any  
8 direct contact with patients who have had jaundice.  
9 It's not my specialty, so I haven't cared for people  
10 with jaundice in the past.
- 11 Q. My question, though, is have you ever been told  
12 what to look for to determine if someone has  
13 jaundice?
- 14 A. It would be in their skin color, and lab work would  
15 probably give more indication on that.
- 16 Q. Besides skin color and lab tests, is there anything  
17 else you've been taught to look for in order to  
18 determine if someone is jaundiced?
- 19 A. Not that I can think of.
- 20 Q. Do you know what septic is?
- 21 A. I do.
- 22 Q. What is septic?
- 23 A. I have learned in nursing school that it's an  
24 infection of the body.
- 25 Q. Were you taught in school what to look for in order

1           to determine if someone is septic?

2 A. Yes.

3 Q. And what were you told to look for?

4 A. They may have different symptoms: vomiting, low

5        vital signs, low heart rate, low blood pressure.

6 Q. Anything else?

7 A. Not that I can think of.

8 Q. Have you ever treated anyone that was septic?

9 A. Not in -- not that I can recall.

10 Q. Do you know if there were any protocols at Turn Key

11      when it came to treating someone that was septic?

12 A. Not that I can recall.

13 Q. Have you ever treated someone that's had diarrhea?

14 A. Yes.

15 Q. Were there any protocols at Turn Key for treating

16      someone with diarrhea?

17 A. Yes, I believe so.

18 Q. And what were those?

19 A. I don't recall all of the instructions for each of

20      the protocols.

21 Q. Which ones do you recall for diarrhea?

22 A. I don't.

23 Q. From your training have you ever been trained on

24      how to treat someone with diarrhea?

25 A. It would depend on other factors. I can't

1           diagnose, I'm not a physician.

2   Q. Well, what would you look for if you were trying to  
3       determine if someone was suffering from diarrhea?

4   A. If they had mentioned it to me.

5   Q. Anything else?

6   A. They may have other symptoms, you know,  
7       dehydration.

8   Q. Anything else?

9   A. Not that I can think of.

10   Q. Do you know who Brenda Sanders is?

11   A. No, I do not.

12   Q. When you were working at Turn Key, did you ever  
13       treat Brenda Sanders?

14   A. I believe that I did; otherwise, I more than likely  
15       wouldn't be here. I believe that I did.

16   Q. Do you recall anything about the treatment that you  
17       provided to Brenda Sanders?

18   A. I don't.

19   Q. If someone was needing continuous medical care, was  
20       it your understanding that they would be moved to  
21       the booking area?

22   A. I believe so, or anyone who was under any sort of  
23       watch.

24   Q. Did anyone ever tell you that Brenda was under any  
25       type of a watch?